

UNITED STATES DISTRICT OF MINNESOTA
FERGUS FALLS DIVISION

R.W. and O.W., minors, individually,
by and through their Parent,
ANDREA ROBINSON,

Case No. 22-cv-153

Plaintiffs,

v.

ROCORI SCHOOL DISTRICT,

Defendant.

COMPLAINT

NOW COME PLAINTIFFS, RW and OW individually, by and through their Parent, ANDREA ROBINSON, by their attorneys, Gingras, Thomsen & Wachs LLP, by Paul A. Kinne and Kimberly D. Sweatt, and by Adams Law Office, by Rebecca Adams hereby state and allege as follows:

PARTIES

1. Plaintiff RW, a minor, individually, by and through his Parent, Andrea Robinson, is a resident of the State of Minnesota. At all times relevant to this Complaint, Plaintiff RW was and currently is residing in Stearns County, Minnesota.

2. Plaintiff OW, a minor, individually by and through her parent, Andrea Robinson, is a resident of the State of Minnesota. At all times relevant to this Complaint, Plaintiff OW was and currently is residing in Stearns County, Minnesota.

3. Defendant, Rocori School District (“RSD”), is a public education school district and governmental entity created under Minnesota Statutes § 123B, *et. seq.* At all times relevant to this Complaint, RSD is a publicly funded school and government entity and receives federal financial assistance and funding as those terms are used under Title VI. At all times relevant to this Complaint, RSD was engaged in the management and government of said school district and was responsible for the actions of its employees and for developing and implementing official policy for the district and for protecting its students and supervising its staff.

JURISDICTION AND VENUE

4. This court has jurisdiction over this matter pursuant to 28 U.S.C. sec. 1331 for the Title VI claims.

5. These claims may be venued in the District of Minnesota pursuant to 28 U.S.C. § 1391, insofar as all of the parties live and/or conduct business in the District of Minnesota, and the circumstances giving rise to this claim occurred in this district.

NATURE OF PROCEEDINGS

6. This lawsuit arises from the Defendant’s deliberate indifference and failure to respond to multiple acts of racial harassment and discrimination directed at RW and OW by both students and staff at the Rocori School District (RSD), as well as its failure to respond to reported student-on-student bullying related to OW’s sexual orientation. This Civil Rights action alleges violations of Title VI as

well as Title IX of the 1964 Civil Rights Act seeking damages, costs, and attorney's fees against Rocori School District.

PROLOGUE

7. The racial discrimination suffered by RW and OW as a result of RSD's deliberate indifference occurred in the middle school and the high school. The Rocori Middle School teaches grades six through eight, and the high school teaches grades nine through twelve.

8. RW, OW, and their mother informed teachers and administrators about student-on-student racial bullying ever since the 2015 – 2016 school year.

9. Despite informing school staff and administrators about the ongoing racial bullying occurring on school grounds, the RSD failed to take any meaningful action.

10. Some of the following allegations are discrete incidents. Some can be consolidated into a general allegation that a racially hostile environment in violation of Title VI existed in RSD and RSD was deliberately indifferent in its response to the racially hostile environment.

FACTUAL ALLEGATIONS

General Allegations

11. Over the course of many years, RW and OW were subjected to student-on-student racial harassment and discrimination at the Rocori School District, for example, they both were called "nigger" on multiple occasions in school classrooms and hallways.

RW

12. RW attended Rocori Middle School from 2015 – 2018.

13. On various dates between the years 2015-2018, RW was racially harassed by students with words such as “nigger” and “coon” being directed to him. These comments occurred both in the classroom and in open areas such as hallways. Most of the instances of racial bullying occurred in the classroom in the presence of teachers. Most often, the racial slurs occurred after teacher instruction, during quiet work time. RW was aware that teachers and other classmates could hear the comments targeted toward him. In classes where there was not an assigned seating arrangement, RW would sit near the front of the class, closest to the teacher, with the hope that teachers would intervene. However, teachers seldom intervened. RW was very aware that teachers opted to not intervene, significantly impacting his sense of safety and esteem.

14. In January 2016, in the lunchroom students directed racial slurs toward RW. RW reported the students to Rocori Middle School Assistant Principal Jake Nelson. The incident was also reported to the school guidance counselor Marsha Gilbertson via email dated January 22, 2016.

15. In January 2016, a student punched RW in the arm after RW refused to move seats in the cafeteria. RW seldom ate lunch because students would bully and harass him by stealing food from his tray and throwing food in his hair. RW wore an “afro” style hairdo.

16. RW often experienced bullying on the bus where students would indicate where he could and could not sit. During the afternoon bus ride on January 21, 2016, when RW refused to move seats, students poured baby powder poured in his hair. RW was afraid to ride the bus after this and Ms. Robinson had to transport RW to school. Ms. Robinson had an email exchange regarding this with the school guidance counselor. Although Ms. Gilbertson stated she would share this information with the principal, she did nothing.

17. In late January / early February of 2016, RW received detention for hitting another student during lunch. On this occasion, students were forcing RW to move tables. When refusing to move, one of the boys took food off of RW's tray. RW was not able to hold back his anger and hit the other student. Assistant Principal Nelson witnessed this incident. Ms. Robinson spoke with Mr. Nelson when he called to inform her of the detention. Ms. Robinson described her frustration that she has reported these types of instances and no disciplinary action was taken against the other students. Ms. Robinson also discussed the bus incident in this conversation. Assistant Principal Nelson downplayed the incident referring to RW's afro as "just hair." Ms. Robinson spent time explaining the significance of hair in the black culture. Assistant Principal Nelson stated the school would not discipline students for the bus instance as the school does not intervene on bus matters.

18. In the spring of 2016, the same students who poured baby powder in RW's hair, made threatening comments to RW referring to killing the family dog. RW responded that his dad would beat up anyone that came to their house. The

parents of the student contacted the principal. Assistant Principal Nelson contacted Ms. Robinson and she was informed that RW was being removed from the bus for the remainder of the year. Ms. Robinson brought up the earlier instances in which the school would not intervene on bus matters. Ms. Robinson also requested the school arrange for the parents of both families to meet with the school to come to some type of resolution. Assistant Principal Nelson refused to arrange such meeting.

19. During the 2017-2018 school year, RW often left school after sunset due to basketball practice, and he often had to stand outside and wait to be picked up. A row of student trucks directly in front of him in the school parking lot had confederate flags attached to them. The display caused RW fear and intimidation.

20. During the 2017-2018 school year, a White student ("S") had previously targeted RW with racial slurs. During class he called RW a "nigger." RW indicated that if S did not stop, he would beat him up after class. Upon making this statement RW became afraid for his safety and gave his friend his cell phone to record in case anything happened. In the hallway, S again called RW a "nigger." RW and S had a fight. A teacher broke up the fight and RW and S were brought to the office. Initially, RW did not want to talk to Assistant Principal Nelson. Eventually, RW indicated that S had called him a "nigger," and it reminded him of a time back in October when S previously was targeting RW. Once Ms. Robinson arrived and watched the video, she spoke with RW, learned the full extent of the story, the ongoing racial harassment, and that out of fear that RW would be attacked by a

larger group of boys he gave his phone to his friend. Ms. Robinson reiterated all of these things to Assistant Principal Nelson, none of which were included in the suspension paperwork. RW received an out-of-school suspension for 3 days; the other student did not receive out-of-school suspension.

21. After the fight, S's parents requested a meeting with RW's parents. The school contacted RW's parents and arranged for an in-school meeting; unlike the previous instance where Ms. Robinson requested to meet with the other parents and the school refused to arrange a meeting. This meeting ended up being a safe place for S's parents to share their anger with RW's parents and requesting assurance that their son was safe. The principal did not engage in the discussion, but rather allowed S's parents to diminish RW's experience and deny that racism is an issue.

22. After the incident with S and continuing for the remainder of the 2017-2018 school year, RW was targeted by the music teacher, often being removed from class for very small things. The music teacher often targeted three boys in particular, RW and the only two other dark-skinned children in class. In one instance, RW simply took his phone out to look at the clock and was immediately excused from class.

23. On the last day of the 2017-2018 school year, RW's eighth grade class took a field trip to Valley fair. On the bus, RW was targeted and continually engaged by a group of boys to fight. RW had won a giant life-size bear at the fair and was able to hide behind the bear for protection. Although the teacher and

chaperone heard the verbal attacks, no one intervened. Upon exiting the bus, Ms. Robinson saw something was visibly wrong. RW told his mom that he would never attend Rocori again and no one could make him.

24. During the 2018-2019 school year, RW switched school districts, requiring his parents to transport him 20 miles away. During this school year, RW was able to significantly reduce his medication and take half of the dose of ADHD medication while still being successful in school.

25. By the start of the 2019-2020 school year, RW appeared to be doing much better, and he was willing to attend Rocori High School. RW returned to RSD for the 2019-2020 school year.

26. During the 2019-2020 school year, RW again had his medication increased and failed numerous classes. RW extensively struggled in school often being tardy to class, not completing work, and at being times sent to the office.

27. During RW's tenure at RSD, he had several outbursts, often begging not to go to school. RW's personality went from a fun-loving child to an introvert; spending most of his time in his bedroom. This was caused by the deliberate indifference to the racially hostile educational environment at Rocori.

28. Prior to attending Rocori Middle School, RW was diagnosed with ADHD and took what is considered to be an average dose of medication for children his age. During middle school, RW's medication doubled. RW's sleep was also limited, requiring a prescription medication to sleep. This was caused by the deliberate indifference to the racially hostile educational environment at Rocori.

29. As a result of the racial harassment and discrimination at RSD, RW's education was impacted, and his grades significantly dropped.

30. As a result of the emotional impacts of the racial harassment and discrimination RW endured at RSD, he had to stop working, and was unable to work for a period of approximately four months in 2021.

OW

31. Plaintiff OW attended Rocori Middle School from 2017 through 2020, and Rocori High School for the 2020-2021 school year.

32. As a result of RSD's deliberate indifference to racial and sexual harassment and discrimination, OW transferred to another school district for the 2021-2022 school year.

33. On various dated between 2017 – 2021, OW experienced racial bullying in the classrooms and hallways of RSD. Prior to 2020, the racial bullying occurred in OW's presence and included significant exclusion, verbal attacks, and rumors. Specifically, students called OW a "nigger," and made fun of her hair. Students would encourage OW to cut pieces of her hair out to be accepted. Racial bullying was so prevalent, it was more of the norm, than uncommon. During this time period, when teachers heard the word "nigger" being used, they did not intervene.

34. Additionally, on various dates between 2017 – 2021, OW was harassed for sexual orientation. Based on her body type, she was called a dinosaur. OW was also significantly targeted for her sexual orientation, as students called OW a "slut" and bi-sexual.

35. During the Spring 2019, Olivia sought intervention from Assistant Principal Nelson for rumors that students started that OW was pregnant. Since OW was afraid to go to the school office on her own, OW asked Ms. Robinson to contact the school and have the office call her down. When OW asked for help from Assistant Principal Nelson, instead of supporting OW, Mr. Nelson asked her if it was true. Ms. Robinson emailed Assistant Principal Nelson on April 4, 2019 reiterating that OW was struggling with the rumors. Mr. Nelson did not intervene.

36. Starting with the Fall 2020 semester, racial bullying became worse, to the point that OW no longer wanted to attend school and did not feel safe. Due to the COVID 19 pandemic, students were learning in a hybrid schedule and attended school in person every other day. During this time, a significant amount of racial bullying occurred on online platforms but impacted OW's school environment. On almost a daily basis, Ms. Robinson witnessed racial attacks toward OW on online platforms from RSD students. RSD made no attempt to accommodate, address the racial bullying, or provide an equitable education to OW.

37. In October 2020, Ms. Robinson requested that OW be switched to distance learning due to ongoing racial bullying impacting her mental health and her education.

38. On October 29, 2020, a former RSD staff member sent an email to the RSD School Board and RSD Superintendent Kelvington describing the depth of student-on-student racial discrimination and harassment.

39. In late October or early November 2020, OW's mental health declined as a result of racial bullying to the point where OW wanted to commit suicide. Ms. Robinson brought OW to the Emergency Room for a mental health evaluation.

40. On December 3, 2020, a group chat made up of over 50 RSD students was re-named "[OW] is a bi-sexual slut" by a student in RW's grade. OW alerted her parents who asked to be added to the snapchat group in an attempt to intervene. RW was also added to the group chat at some point. Over 50 students were bystanders doing nothing, while a handful engaged in violent language after RW told the boys to leave his sister alone. Although RW did not threaten any of the children, he was threatened and asked for his address. The comments moved from threats of assault into death threats that included lynching, ropes, and racial slurs. When Ms. Robinson was unable to disengage the children, she made a Facebook post requesting the boy's mothers contact her regarding the racial slurs and death threats and added screen shots of the snapchat comments.

41. On December 4, 2020, high school principal Mr. Guetter alerted the police regarding the post on Facebook made by Ms. Robinson and the screenshots. The Cold Spring Police Department contacted Ms. Robinson and OW at their residence. Ms. Robinson emailed the screenshots to the police later that day.

42. Although the school was well-aware of the racial bullying directed at OW by RSD students via the group snapchat, they never reached out to OW or Ms. Robinson. On December 4, 2020, Ms. Robinson went into the school to personally speak with Principal Guetter. Ms. Robinson told Principal Guetter that the ongoing

racial harassment continued to disrupt OW's learning environment because she was unable to return to mainstream school and she had to go to the emergency room a month earlier contemplating suicide. In this meeting Ms. Robinson requested the following of the school verbally:

- a. The school take immediate discipline action against the students involved in the group messages.
- b. The students involved be immediately suspended from athletics for 2 weeks in accordance with Minnesota State High School League ("MSHL") policy
- c. A letter be sent out to all district families regarding bullying, racism, and the importance of parental monitoring children's social media accounts

43. Mn. Statute § 121A.031, School Student Bullying Policy Sub 1. "[a]pplies to bullying by a student against another student enrolled in a public school which occurs: (a)(3) "by use of electronic technology and communications off the school premises to the extent such use substantially and materially disrupts student learning or the school environment."

44. Nevertheless, in response to Ms. Robinson's pleading that the school intervene in the ongoing racial bullying, Principal Guetter stated the school could not do anything about the messages even despite the proof of screenshots Ms. Robinson provided. Mr. Guetter's response also included:

a. The athletic suspension would only be addressed secondary to a police investigation.

b. No response was given regarding Ms. Robinson's request to alert district families; however, a letter never went out.

45. AM is one of the RSD students who threatened RW and OW on Snapchat. The following are just of a few of AM's statements on the thread: "My trees r pretty dry I need to decorate them for Christmas" "Juts [sic] to make a little fair wake me up then I will roll out of bed and beat your ass." "Accally [sic] I could do it fucking sleeping so nvm" "I juts wanan [sic] know haw many more niggas r goig to die tonight" and "[OW] ur a fucking slut"

46. On December 5, 2020, the mother of AM acknowledged her son did send the messages.

47. On December 6, 2020, AM's mother and Ms. Robinson spoke on the phone. During this conversation, AM's mother stated that her son would write an apology letter to RW and OW and that so as long as formal charges were not pressed against her son, AM would agree to a 2-week athletic suspension as outlined by MSHL. AM's mother also informed Ms. Robinson that the school resource officer was taking AM under his wing and meeting with him over the weekend for some type of engagement.

48. On December 10, 2020, Ms. Robinson spoke with the school guidance counselor about the disruption that the ongoing racial bullying is having on OW's mental health and academic progress in school.

49. On January 11, 2021, hybrid learning transitioned to full-time in person learning. OW was unable to return to mainstream school at this point because RSD failed to take any remedial measures to prevent racial bullying from recurring and to protect, support, and intervene on behalf of OW.

50. During the Spring 2021 semester OW continued to struggle as a result of the ongoing racial bullying and RSD's refusal to intervene. On March 9, 2021, Ms. Robinson emailed the guidance office inquiring how long OW has to complete fourth term classes since OW was struggling, and nothing was working. Ms. Robinson also inquired about how OW would make up these classes.

51. On March 30, 2021, Ms. Robinson met with RSD Superintendent Kelvington, without invitation, to address the ongoing racial harassment and discrimination against her children at the school and to express the need to have her children in a safe learning environment. Ms. Robinson told Superintendent Kelvington that not only are her children failing school, but there are no remedial actions being taken. She discussed the prevalent racism and unfair punishments her children have faced over the years. In this meeting Superintendent Kelvington appeared sympathetic and stated that, aside from the December Snapchat incident, he was unaware of any racism and bullying in the school. This statement was surprising given that Superintendent Kelvington was a recipient of an email sent by a former staff member on October 29, 2020 regarding RSD's racist environment. Ms. Robinson requested that RSD send a letter regarding racial bullying and the

importance of parental involvement in monitoring social media. A letter did not go out. RSD took no action to address Ms. Robinson's concerns.

52. On March 30, 2021, prior to Ms. Robinson's meeting with Superintendent Kelvington, RSD's only Black staff member met with Superintendent Kelvington regarding the prevalent racial bullying she witnessed in school as well as her experience with discrimination among the school administration.

53. At the April 26, 2021 school board meeting, AM, the same student who racially and sexually harassed OW and made lynching threats via Snapchat, was recognized with the "Rocori Proud" award. This award is given to students who embody the school's mission and values in action. By bestowing this award on AM, RSD took a public stance in its message that racism is an action embraced by the RSD's mission and values.

54. Superintendent Kelvington was present at the April 26, 2021 school board meeting when AM was announced as the ROCORI Proud award recipient. Superintendent Kelvington did not mention the racism that AM engaged in.

55. On April 30, 2021, an RSD staff member informed Ms. Robinson via Facebook messenger that AM was given the ROCORI Proud award.

56. On May 1, 2021, Ms. Robinson made a public plea via Facebook regarding the racial bullying her children faced and the school's failure to act. Ms. Robinson's Facebook post went viral.

57. In response Ms. Robinson's viral Facebook post, on May 2, 2021, Superintendent Kelvington called Ms. Robinson's personal cell phone. During the conversation, Superintendent Kelvington stated the school took corrective action and the post announcing the award to AM would be removed that evening from the school's webpage, but that AM would be allowed to keep the award. Ms. Robinson stated that the post may as well remain so long as AM was allowed to keep the award, and that this type of action does nothing but brush RSD's racist problem under the rug. Superintendent Kelvington stated that RSD would "do better next year" and that the post would be removed from the school's webpage for AM's safety.

58. On May 3, 2021, after someone commented that the school was racist, the school began engaging in action to protect AM, by removing its Facebook post about the ROCORI Proud award and by removing the award from the webpage and school board record. Meanwhile, RSD has never taken action to protect RW or OW.

59. On May 5, 2021, Superintendent Kelvington sent out an email to district families regarding inclusion and Rocori vision 2025. This email did not mention racism or racial bullying.

60. On May 6, 2021, an RSD teacher contacted Ms. Robinson stating that she and other staff are scared because Superintendent Kelvington threatened them about reporting racism. The teacher described to Ms. Robinson how Superintendent Kelvington intimidated one teacher of bi-racial students stating she "is the face of it now" because the teacher reported the Snapchat incident to Principal Guetter.

These actions set the precedent that reporting racism would not be tolerated in Cold Spring, Minnesota.

61. On May 7, 2021, Ms. Robinson was contacted by a para-professional in Mr. Captain's science class indicating the teacher failed to do anything about the bullying of an Asian student in discussion of COVID and that the racial bullying was reported to the administration, who also failed to act. This is the same science class that later had a black student slide replaced with the confederate flag the prior year.

62. On May 17, 2021, in Mr. Matt Captain's science class, students were each required to upload a PowerPoint slide to a shared drive for an assignment. Students had access to other student's slides. The slide of a Black student was replaced by a picture of the confederate flag. The teacher deleted the slide in class but failed to address the situation. Ms. Robinson was immediately contacted via text by a para-professional present in the classroom describing the scenario as it occurred. Ms. Robinson called Principal Guetter and informed him of the situation. Although IT systems are in place and nothing is ever fully deleted from the cloud, the school did not discipline any students or investigate further.

63. On May 17, 2021, Ms. Robinson contacted the school guidance counselor to inquire about summer school and the option of online learning for OW due to the ongoing safety concerns and the school's failure to protect OW.

64. On May 24, 2021, Ms. Robinson spoke at an RSD school board meeting about her family's journey with racial bullying at RSD.

65. On June 1, 2021, Ms. Robinson received an email from the guidance counselor in response to her request for accommodation for online summer school learning for OW. The guidance counselor indicated that RSD would not make any accommodations for OW. The guidance counselor's suggested solution was to send OW to another school district. The guidance counselor stated that Ms. Robinson would either need to pay for online summer school at the other District out of pocket or enroll OW in that other school district for the next year to avoid the charge.

66. Ms. Robinson later discovered that RSD completed summer school via an automated platform called Edgenuity. Therefore, a viable accommodation would have been for RSD to allow OW to learn from home for summer school without expending additional resources. This option was never presented to Ms. Robinson.

67. In August, 2021, Ms. Robinson requested that RSD grant OW the option of receiving pass/fail grades versus the normal grading scale because OW's grade point average significantly decreased as a result of the impact that racial and sexual harassment and discrimination had on OW. In her request, Ms. Robinson cited to other local schools that were giving students the pass/fail option as well as the guidance from the Department of Education regarding the grading and assessments as it relates to equity and disparities. The school administration declined the request. Ms. Robinson believes the request was rejected by the Superintendent as a result of her speaking out against RSD and him.

68. On September 30, 2021, OW's sixteenth birthday, OW attempted suicide because of the racial harassment and discrimination and sexual harassment

and discrimination she endured at RSD. After her suicide attempt, OW was admitted to an in-patient facility in Fargo for roughly ten days.

69. As a result of RSD's ongoing deliberate indifferent to student-on-student racial and sexual harassment and discrimination, in September 2021, Ms. Robinson made the decision to pull OW from RSD to ensure she is in a safe learning environment. OW now attends a neighboring school district that requires her to be transported to another town on a daily basis.

**FIRST CLAIM FOR RELIEF AGAINST DEFENDANT ROCORI SCHOOL
DISTRICT: VIOLATION OF TITLE VI**

70. The plaintiffs reallege and incorporate the preceding paragraphs as if set forth fully herein.

71. Officials at RSD had actual notice that RW and OW were subjected to an objectively offensive racially hostile educational environment for years.

72. By continuously disregarding the racial harassment, or failing to reasonably intervene to prevent it, RSD intentionally allowed the racially hostile educational environment to occur, and/or it was deliberately indifferent to it in violation of Title VI.

73. The unlawful racial harassment described in this complaint was so severe and objectively offensive that it deprived RW and OW of full access to the educational opportunities and benefits required by Title VI that the school provide to each student.

74. The conduct in violation of Title VI described in this complaint has caused RW and OW physical injuries and severe and psychological and emotional harm.

75. The conduct in violation of Title VI described in this complaint has also caused RW and OW economic harm, including but not limited to falling behind academically, incurring expenses for therapy, and attorney's fees.

SECOND CAUSE OF ACTION: VIOLATION OF TITLE IX

76. The plaintiffs reallege and incorporate the foregoing paragraphs as if set forth fully herein.

77. Superintendent Kelvington and other teachers or staff had actual notice of sexual harassment against OW but took no action to stop the harassment.

78. RSD took no action against the students who harassed OW on the basis of sex. Accordingly, RSD exhibited deliberate indifference to assaults in a way that made OW more vulnerable to the attacks.

79. Both OW and her harassers were RSD students, and all were subjected to RSD's rules and policies. RSD had substantial control over the students who sexually harassed OW.

80. The assaults described in this pleading were so severe and objectively offensive that it deprived OW of access to the educational opportunities and benefits provided by the school.

81. The conduct in violation of Title IX described in this Complaint has caused OW severe and permanent psychological and emotional harm.

82. The conduct in violation of Title IX described in this Complaint has also caused OW economic harm.

WHEREFORE, the plaintiffs demand judgment against the Defendant as follows:

1. Against RSD in amounts sufficient to compensate RW and OW for all economic, physical, and emotional losses.
2. An award of all attorney fees and costs pursuant to 42 U.S.C. § 1988.
3. Any and all other relief the Court deems just to award, including but not limited to equitable relief.

JURY DEMAND

The plaintiff respectfully requests that this matter be tried before a jury of six (6) competent persons.

Dated this ____ day of January, 2022.

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